

EXHIBIT A

VLASAC & SHMARUK, LLC

John M. Vlasac, Jr.
Attorney ID # 020042000
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Iselin, NJ 08830
732-494-3600
(f) 732-494-3601
Attorneys for Plaintiff

RICHARD JOHNSON,

Plaintiff,

vs.

WAL-MART RE BUS INC. #2841, JOHN
DOES 1 - 5 (said names being fictitious, real
names unknown), JOHN DOES 6 - 10 (said
names being fictitious, real names unknown),
ABC CORPS. 1 - 5 (said names being
fictitious, real names unknown) and ABC
CORPS 6 - 10 (said names being fictitious,
real names unknown,

Defendant(s)

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION-BURLINGTONCOUNTY

Docket Number: BUR-L-

CIVIL ACTION

COMPLAINT AND JURY DEMAND

Plaintiff, RICHARD JOHNSON, residing at 24664 E. Main St, Community of Columbus,
Township of Mansfield, County of Burlington, State of New Jersey, by way of Complaint against
the defendants, say:

FIRST COUNT

1. On or about March 16, 2018, plaintiff, RICHARD JOHNSON, was properly and
lawfully at/on or near the property owned, operated, managed or controlled by the defendants,
WAL-MART RE BUS INC. #2841, JOHN DOES 1-5 (said names being fictitious, real names
unknown), and ABC CORPS. 1-5 (said names being fictitious, real names unknown), said property
located at 1740 Route 38 in Township of Lumberton, State of New Jersey. Plaintiff, RICHARD
JOHNSON, was ultimately caused to fall due to water, wet papers towels laying on the floor and/or
an unsafe passageway in the poorly maintained bathroom of the subject property.

2. At the time and place aforesaid, the defendants, WAL-MART RE BUS INC. #2841, JOHN DOES 1-5 (said names being fictitious, real names unknown), and ABC CORPS. 1-5 (said names being fictitious, real names unknown), were owners, operators, and/or property managers of the property/bathrooms and as such were responsible for the operation, management, inspection, control and maintenance of said premises/bathrooms.

3. At the time and place aforesaid, the defendants, WAL-MART RE BUS INC. #2841, JOHN DOES 1-5 (said names being fictitious, real names unknown), and ABC CORPS. 1-5 (said names being fictitious, real names unknown), so negligently, recklessly, and/or carelessly owned, controlled, managed, operated, and/or maintained the property/bathroom so as to cause a hazardous condition to exist which caused the plaintiff to fall, more specifically due to water, wet papers towels laying on the floor and/or an unsafe passageway in the poorly maintained bathroom of the subject property owned by the defendants.

4. As a direct and proximate result of the negligence of the defendants as aforesaid, the plaintiff, RICHARD JOHNSON, sustained serious and permanent injuries. He has suffered and will in the future suffer great pain; he has and will in the future be required to expend large sums of money for the cure and treatment of his injuries; and he has been and will in the future be unable to pursue his normal daily activities as before.

WHEREFORE, the plaintiff, RICHARD JOHNSON, demands judgment against the defendants, WAL-MART RE BUS INC. #2841, JOHN DOES 1-5 (said names being fictitious, real names unknown), and ABC CORPS. 1-5 (said names being fictitious, real names unknown), either jointly, severally or in the alternative for damages together with interests and costs of suit.

SECOND COUNT

1. Plaintiffs repeat and adopt each and every allegation of the First Count of the

Complaint as if same were fully set forth herein at length.

2. At the time and place aforesaid, defendants, JOHN DOES 6-10 (said names being fictitious, real names unknown), and ABC CORPS. 6-10 (said names being fictitious, real names unknown), were the persons/entities hired or contracted by the defendant owners WAL-MART RE BUS INC. #2841, JOHN DOES 1-5 (said names being fictitious, real names unknown), and ABC CORPS. 1-5 (said names being fictitious, real names unknown) to treat, clean and/or maintain the subject property specifically with regard to maintenance and/or upkeep of the subject property/bathroom.

3. At the time and place aforesaid, the defendants, JOHN DOES 6-10 (said names being fictitious, real names unknown), and ABC CORPS. 6-10 (said names being fictitious, real names unknown) through their agents, servants and/employees, so negligently, carelessly and/or recklessly treated, cleaned and/or maintained the subject property/bathroom in failing to maintain and/or upkeep the subject property/bathroom so as to cause a hazardous condition to exist which caused the plaintiff to fall, more specifically due to water, wet papers towels laying on the floor and/or an unsafe passageway in the poorly maintained bathroom of the subject property owned by the defendants..

4. As a direct and proximate result of the negligence of the defendants as aforesaid, the plaintiff, RICHARD JOHNSON, sustained serious and permanent injuries. He has suffered and will in the future suffer great pain; he has and will in the future be required to expend large sums of money for the cure and treatment of his injuries; and he has been and will in the future be unable to pursue his normal daily activities as before.

WHEREFORE, the plaintiff, RICHARD JOHNSON, demands judgment against the defendants, WAL-MART RE BUS INC. #2841, JOHN DOES 1-5 (said names being fictitious,

real names unknown), JOHN DOES 6-10 (said names being fictitious, real names unknown), ABC CORPS. 1-5 (said names being fictitious, real names unknown) and ABC CORPS. 6-10 (said names being fictitious, real names unknown), either jointly, severally or in the alternative for damages together with interests and costs of suit.

THIRD COUNT

1. Plaintiffs repeat and adopt each and every allegation of the First and Second Count of the Complaint as if same were fully set forth herein at length.

2. At the time and place aforesaid, defendants, WAL-MART RE BUS INC. #2841, JOHN DOES 1-5 (said names being fictitious, real names unknown), and ABC CORPS. 1-5 (said names being fictitious, real names unknown) negligently, carelessly and/or recklessly hired, supervised and/or inspected the work/services provided by the defendants, JOHN DOES 6-10 (said names being fictitious, real names unknown) and ABC CORPS. 6-10 (said names being fictitious, real names unknown) so as to cause a hazardous condition to exist which caused the plaintiff to fall, more specifically due to water, wet papers towels laying on the floor and/or an unsafe passageway in the poorly maintained bathroom of the subject property owned by the defendants.

3. As a direct and proximate result of the negligence of the defendants as aforesaid, the plaintiff, RICHARD JOHNSON, sustained serious and permanent injuries. He has suffered and will in the future suffer great pain; he has and will in the future be required to expend large sums of money for the cure and treatment of her injuries; and he has been and will in the future be unable to pursue his normal daily activities as before.

WHEREFORE, the plaintiff, RICHARD JOHNSON, demands judgment against the defendants, WAL-MART RE BUS INC. #2841, JOHN DOES 1-5 (said names being fictitious, real names unknown), JOHN DOES 6-10 (said names being fictitious, real names unknown), ABC

CORPS. 1-5 (said names being fictitious, real names unknown), ABC CORPS. 6-10 (said names being fictitious, real names unknown) either jointly, severally or in the alternative for damages, together with interests and costs of suit.

JURY DEMAND

Plaintiffs demand trial by jury on all issues.

NOTICE OF DESIGNATION OF TRIAL COUNSEL

PLEASE TAKE NOTICE that pursuant to the Rules of the Court, John M. Vlasac, Jr., Esq. is hereby designated as trial counsel of the within matter.

DEMAND FOR ANSWERS TO INTERROGATORIES

Pursuant to Rule 4:17-1(b), the plaintiff hereby demands that the defendant provide answers to the uniform interrogatories as set forth in Form C and C(1) of Appendix II of the rules Governing the Courts of the State of New Jersey.

**DEMAND FOR DISCOVERY OF
INSURANCE COVERAGE**

Pursuant to R. 4:10-2(b) demand is hereby made that you disclose to the undersigned whether there are any insurance agreements or policies under which any person or firm carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in this action or to indemnify or reimburse for payments made to satisfy the judgment.

Yes () No ()

If the answer is "yes" state the type of each policy for which coverage exists:

General Liability	Yes ()	No ()
Commercial	Yes ()	No ()
Umbrella	Yes ()	No ()
Excess	Yes ()	No ()
Othis	Yes ()	No ()

If the answer is "yes" attach a copy of each policy or, in the alternative, state under oath or certification the following:

- (a) Policy Number
- (b) Name and address of insurer or issuer
- (c) inception and expiration dates
- (d) names and addresses of all persons insured thereunder
- (e) personal injury limits
- (f) property damage limits
- (g) medical payment limits
- (h) name and address of person who has custody and possession thereof
- (i) where and when each policy or agreement can be inspected and copied.

CERTIFICATION

I certify that the within matter is not the subject of any other pending court or arbitration proceeding.

VLASAC & SHMARUK, LLC
Attorney for the Plaintiffs

/s/ John M. Vlasac, Jr., Esq.
JOHN M. VLASAC JR., ESQ.

Dated: November 27, 2019

CERTIFICATION PURSUANT TO R. 4:5-1

I, JOHN M. VLASAC, JR., hereby certify as follows:

1. I am attorney at law of the State of New Jersey and am a member of the firm and as such, I am fully familiar with same.
2. To the best of my knowledge, confirmation and belief, there is no other action pending about the subject matter of this Complaint in the Superior Court of New Jersey, Law Division, Burlington County. Additionally, there are no other persons known to me who should be added as parties to this matter, nor are there any other actions contemplated.

3. I do hereby certify that the foregoing statements made by me are true to the best of my knowledge. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

VLASAC & SHMARUK, LLC
Attorney for the Plaintiffs

/s/ John M. Vlasac, Jr., Esq.
JOHN M. VLASAC JR., ESQ.

Dated: November 27, 2019

Civil Case Information Statement

Case Details: BURLINGTON | Civil Part Docket# L-002500-19

Case Caption: JOHNSON RICHARD VS WAL-MART RE
BUS INC. #2841

Case Initiation Date: 11/27/2019

Attorney Name: JOHN MICHAEL VLASAC

Firm Name: VLASAC & SHMARUK, LLC

Address: 485B ROUTE 1 SOUTH STE 120

ISELIN NJ 08830

Phone: 7324943600

Name of Party: PLAINTIFF : JOHNSON, RICHARD

Name of Defendant's Primary Insurance Company

(if known): Claims Management, Inc.

Case Type: PERSONAL INJURY

Document Type: Complaint with Jury Demand

Jury Demand: YES - 6 JURORS

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

Do you anticipate adding any parties (arising out of same transaction or occurrence)? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? NO

If yes, is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? NO

Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:

Do you or your client need any disability accommodations? YES

If yes, please identify the requested accommodation:

MOBILITY AIDS (WHEELCHAIR-GURNEY-BED)

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO

Title 59? NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule* 1:38-7(b)

11/27/2019

Dated

/s/ JOHN MICHAEL VLASAC

Signed

BURLINGTON COUNTY
SUPERIOR COURT
49 RANOCAS ROAD
MT HOLLY NJ 08060

TRACK ASSIGNMENT NOTICE

COURT TELEPHONE NO. (609) 288-9500
COURT HOURS 8:30 AM - 4:30 PM

DATE: NOVEMBER 27, 2019
RE: JOHNSON RICHARD VS WAL-MART RE BUS INC. #2841
DOCKET: BUR L -002500 19

THE ABOVE CASE HAS BEEN ASSIGNED TO: TRACK 2.

DISCOVERY IS 300 DAYS AND RUNS FROM THE FIRST ANSWER OR 90 DAYS
FROM SERVICE ON THE FIRST DEFENDANT, WHICHEVER COMES FIRST.

THE PRETRIAL JUDGE ASSIGNED IS: HON SUSAN L. CLAYPOOLE

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 003
AT: (609) 288-9500.

IF YOU BELIEVE THAT THE TRACK IS INAPPROPRIATE YOU MUST FILE A
CERTIFICATION OF GOOD CAUSE WITHIN 30 DAYS OF THE FILING OF YOUR PLEADING.

PLAINTIFF MUST SERVE COPIES OF THIS FORM ON ALL OTHER PARTIES IN ACCORDANCE
WITH R.4:5A-2.

ATTENTION:

ATT: JOHN M. VLASAC
VLASAC & SHMARUK, LLC
485B ROUTE 1 SOUTH
STE 120
ISELIN NJ 08830

ECOURTS

VLASAC & SHMARUK, LLC

John M. Vlasac, Jr.
Attorney ID # 020042000
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CORPS 6 - 10 (said names being fictitious,
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Defendant(s)

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION-BURLINGTONCOUNTY

Docket Number: BUR-L-2500-19

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4. As a direct and proximate result of the negligence of the defendants as aforesaid, the plaintiff, RICHARD JOHNSON, sustained serious and permanent injuries. He has suffered and will in the future suffer great pain; he has and will in the future be required to expend large sums of money for the cure and treatment of his injuries; and he has been and will in the future be unable to pursue his normal daily activities as before.

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- (a) Policy Number
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- (c) inception and expiration dates
- (d) names and addresses of all persons insured thereunder
- (e) personal injury limits
- (f) property damage limits
- (g) medical payment limits
- (h) name and address of person who has custody and possession thereof
- (i) where and when each policy or agreement can be inspected and copied.

CERTIFICATION

I certify that the within matter is not the subject of any other pending court or arbitration proceeding.

VLASAC & SHMARUK, LLC
Attorney for the Plaintiffs

/s/ John M. Vlasac, Jr., Esq.

JOHN M. VLASAC JR., ESQ.

Dated: February 24, 2020

CERTIFICATION PURSUANT TO R. 4:5-1

I, JOHN M. VLASAC, JR., hereby certify as follows:

1. I am attorney at law of the State of New Jersey and am a member of the firm and as such, I am fully familiar with same.
2. To the best of my knowledge, confirmation and belief, there is no other action pending about the subject matter of this Complaint in the Superior Court of New Jersey, Law Division, Burlington County. Additionally, there are no other persons known to me who should be added as parties to this matter, nor are there any other actions contemplated.

3. I do hereby certify that the foregoing statements made by me are true to the best of my knowledge. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

VLASAC & SHMARUK, LLC
Attorney for the Plaintiffs

/s/ John M. Vlasac, Jr., Esq.
JOHN M. VLASAC JR., ESQ.

Dated: February 24, 2020